

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

JURY TRIAL DEMANDED

NOTICE OF RELATED PROCEEDINGS IN OTHER JUDICIAL DISTRICT

Defendants Samsung Electronic Col, Ltd. and Samsung Electronics America, Inc. (collectively “Samsung”) respectfully file this Notice of Related Proceedings and notify the Court that on May 7, 2025, Plaintiff Headwater Research LLC (“Headwater”) filed a separate Motion to Quash in the District Court for the Northern District of California, San Jose Division. *In re Subpoena to Krista Jacobsen*, No. 3:25-mc-80104 (N.D. Cal.). In this motion, Headwater (1) seeks an Order quashing Samsung’s April 7, 2025 subpoena for non-party Krista Jacobsen (“Ms. Jacobsen”) to produce documents and sit for deposition, or, alternatively, (2) transfer of the proceeding to the United States District Court for the Eastern District of Texas pursuant to Fed. R. Civ. P. 45(f). Samsung will not oppose the requested transfer.

Dated: May 9, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on May 9, 2025, with a copy of this document via the Court's CM/ECF.

/s/ Thad C. Kodish
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